

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

William Boykin, <i>et al.</i> ,)	
)	
)	No. 13-7159
Appellants)	
vs.)	
)	
Adrian Fenty, <i>et al.</i>)	
)	
Appellee)	
_____)	

**APPELLANTS’ MOTION TO FILE A BRIEF WITH INCREASED
PAGE LIMIT**

Pursuant to Federal Rules of Appellate Procedure 28(e)(2),(3) and 32(a)(7)(B),(C), Appellants respectfully submit this motion for leave to file a brief of sixty pages, extending the page limit thirty more pages. Appellees have represented through counsel that they have no position regarding Plaintiffs’ request.

INTRODUCTION AND SUMMARY

The instant appeal involves numerous claims arising under the Americans with Disabilities Act, 42 U.S.C. §§ 12101 *et seq.*, 12131, and 12132 (“ADA”), the Fair Housing Act, 42 U.S.C. §§ 3601-3631 and 3604.01(f)(1) (“FHA”), the District of Columbia Human Rights Act, D.C.

Official code §§ 2-1401 *et seq.*, and 2-1402.21(a)(4) (place of residence discrimination (“DCHRA”).

These claims arose from the closure of La Casa Shelter, the only Hispanic public shelter and the last low barrier public men’s shelter in Ward 1, located at 1436 Irving Street in Northwest Washington, D.C. Plaintiffs were seeking injunctive relief and a declaratory judgment to oppose the District’s closure of the shelter and point to a larger, systematic pattern of removal of the homeless, who are predominantly minority and disabled, from the largely Caucasian wards of the District.

Appellants seek a page increase to a total of sixty pages because of the number and complexity of issues raised in Appellants’ opening brief, and the importance of the issues this appeal involves. The appeal presents numerous issues, including disparate treatment and disparate impact claims under the FHA and ADA, as well as place of residence discrimination under the DCHRA. Appellants respectfully submit that full development and presentation of these issues requires more than the current page limit of thirty pages. Granting the additional pages will help ensure the Court the benefit of a full presentation of all of the issues.

CONCLUSION

Wherefore, for the reasons stated herein, along with any other reasons that may become apparent, Appellants respectfully move this Court to grant its leave for Appellants to file their brief with a page limit of sixty pages.

April 25, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to verify that true and correct copies of the attached document have been filed electronically and served by both overnight delivery and electronic mail on this 25th day of April, 2014, on counsel listed below.

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